

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
KIM MOORE,

Plaintiff,

-against-

HADESTOWN BROADWAY LIMITED
LIABILITY COMPANY,

Defendant.
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**NOTICE OF MOTION
TO DISMISS PURSUANT
TO FRCP 12(b)(6)**

23-CV-04837 (LAP)

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Heather P. Harrison in Support of Defendant's Motion to Dismiss, dated August 21, 2023, and the exhibits annexed thereto, upon the accompanying Memorandum of Law in Support of Defendant's Motion to Dismiss, and upon all prior papers and proceedings had heretofore in the above-captioned matter, Defendant Hadestown Broadway Limited Liability Company, by its attorneys, the Law Office of Vincent Toomey, will move this Court before the Honorable Loretta A. Preska, United States District Judge, Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on the 27th day of September, 2023, at 10:00 a.m., or as soon thereafter as counsel may be heard, for an Order granting the Defendants' motion to dismiss pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and dismissing all of Plaintiff's claims against the Defendant for failure to state a claim upon which relief can be granted, and for such other and further relief as this Court deems just and proper.

Dated: Lake Success, New York
August 21, 2023

Respectfully submitted,
LAW OFFICE OF VINCENT TOOMEY

A handwritten signature in blue ink, reading "Heather P. Harrison", is written over a horizontal line.

Vincent Toomey

Heather P. Harrison

Attorneys for Defendant

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cc: Joshua Mathew Friedman
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Attorneys for Plaintiff
Via ECF